McKesson's Controlled Substance Monitoring Program Oxycodone Threshold Reduction Report

Date: February 9th, 2015

By: Nate Hartle, Sr. Director of Regulatory Affairs RNA Customer Name: Multiple RNA Customers

OVERVIEW:

On this date I Nate Hartle, Sr. Director of Regulatory Affairs made reductions to oxycodone thresholds in the SAP system affecting 2,624 RNA customers. These changes were part of an ongoing review and analysis of thresholds to consistently and programmatically reduce the gap between customer's purchases and their current thresholds. This is being implemented as a short term solution while waiting for AGI to develop more robust statistically driven thresholds. Below is the high level process used for RNA.

DATA ORGANIZATION:

All relevant information was gathered and organized in a spreadsheet for review to include the following:

- Registrant Information DEA #, store name and #, chain, location, etc.
- Current Thresholds Current SAP threshold for base code 9143 (oxycodone).
- Oxycodone Purchases Past 12 months of purchases.
- Previous Threshold Changes Any threshold changes for 9143 in the past 6 months including the date and text comments.

THRESHOLD REVIEW / CALCULATION:

- 1. 6 Month Maximum The previous six months were reviewed and the maximum month was identified.
- 2. **New Threshold Amount** The maximum amount was used along with a buffer of 25% to account for variations by month, and the amount was rounded to the next 1000.
- 3. **Current Threshold Review** The new proposed threshold was compared against current thresholds and only registrants identified as being eligible for a reduction were moved to the next stage of review.
- 4. **Past Threshold Changes** Threshold changes for the past six months were reviewed and the amount and reason text were pulled into the spreadsheet. Dates and reason texts were reviewed and some registrant reductions were changed due to recent TCR requests and reviews by the DRA.
- 5. **New Supply Chain Agreements** Select RNA customers were reviewed and removed from the total process due to recent supply change agreements that will cause purchase information to change over the next months. For example, Price Chopper, Hy-Vee and Wakefern were removed after initial review and will be re-evaluated in 3-6 months.

AUDIT:

Once the initial list of registrants was finalized, an audit was performed to pull in January purchase amounts to validate new thresholds and determine if any beginning of month changes may have affected the calculations. Micheal Bishop pulled new January totals on February 3rd and it was determined that 13 registrants had new January totals that were now the 6 months max. These 13 were recalculated and adjusted in the original spreadsheet.

SAP CHANGES:

All registrants being reduced were put into a CSV file and uploaded into SAP on February 9th. This included 2,624 customers with a total reduction of approximately 17.1 million doses. All information is located in a folder on the R drive.

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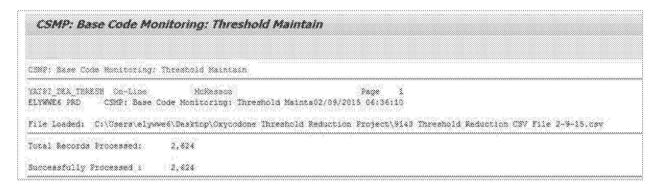
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APPENDIX/IMAGES:

Spreadsheet Example

¥	<u> </u>		CSMP	12M											Mz -	Reduct		Last		
DEA Number •	Cust Name	¥	Dose Thres *	Avç	Threshold % *	3M Avg	Threshold	Art	Se~	Orn.	Nc~	De	Ja~	6 M M *	Buffan	ion I	Red	SAT.	Am~"	Tezt
RW0282145	WAL-MART DC 6	3045PI-	2,350,000		0.00%									0	8,000	######	Y		-250020002000	
RC0347725	CVS LA HABRA-	BRAN	627,000		0.00%									0	8,000	-619,000	30			
RA0253877	ADVANTAGE LO	GISTIC	577,000	45 925	7.96%		2,000	93,000						93,000	117,000	-460,000	3"			
RS0463428	ADVANTAGE LO	GIST (577,000	0.03	6.39%	82,733	18.34%	14,400	62,400	117,600	83,200	90,900	74,100	117,600	147,000	-430,000	50			
PG0149650	AMERICAN SALI	ES CO	172,000		0.00%									0	8,000	-164,000	31			
BW9061691	ZZVEGMANS CE	ENTR/	106,000	84.9	0.80%	1,100	1045,			5,683		800	1,400	5,683	8,000	-98,000	Y	9/13/14	106000	ON-BOARD: C
BS6907224	CVS/CM 2921 VS	VDS	74,000	1106	150%	1,233	1875	400	800	1,300	1,200	1,900	600	1,900	8,000	-66,000	Y			
BC9060459	CAREMARK (SA	T) FD(74,000	6	0.07%	300	0.41%		A contract to the contract contract		200	400		400	8,000	-66,000	Y			
BP9587847	OPTUMBX		74,000		8.60%									0	8,000	-66,000	Y			
BA8148985	AETNA BX HOM	E DELI	134,000	55 326	41.25%	46,535 13,318	34.70%	52,200	50,300	55,700	52,200	57,700	29,706	57,700	73,000	-61,000	Y			
AR2360686	RALEYSPHARM	4ACY (76,000	88.879	20 49%	13,318	94.70% 17.52%	10,300	17,500	13,679	13,527	12,509	13,918	17,500	22,000	-54,000	Y			
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SAP Change Validation



Reporting Example

Chain Name	● of Registrants	Nov Avg	Bec Avg	Jan Avg	Avg Threshold	of Registrants Reduced	X of Registrants Reduced	Total Reduction	% of Total Threshol	Total Threshold Amount
RITE AID	4,566	6,660	7,421	6,869	12,401	1,131	24.77%	-5,108,400	-9.03%	56,546,400
CVS	1,754	4,762	5,312	4,944	11,330	480	27.37%	-2,576,680	-12.97%	19,873,205
WALMART Warehouse	1	0	0	0	2,350,000	1	100.00%	-2,342,000	-99.66%	2,350,000
ALBERTSONS	766	903	1,046	900	9,923	211	27.55%	-1,419,600	-18.92%	7,501,600
SUPERVALU Ware House	2	83,200	90,900	74,100	577,000	2	100.00%	-890,000	-77.12%	1,154,000
COSTCO	460	2,348	2,739	2,640	10,079	111	24.13%	-688,800	-14.86%	4,636,500
CVS Warehouse	1	0	0	0	627,000	1	100.00%	-619,000	-98.72%	627,000
Topco-RALEYS	96	4,743	5,290	4,932	13,875	54	56.25%	-406,000	-30.48%	1,332,000
Topco - BASHAS	41	7,332	7,986	7,613	21,341	24	58.54%	-391,000	-44.69%	875,000
TARGET	1,665	2,264	2,652	2,396	8,513	112	6.73%	-372,800	-2.63%	14,166,400
CADEMADK		7.729	9.995	9.422	20.092	19	34 EE.A	217.450	29.731/	1.105.050

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	# of Registran	Nov	Dec		Avg Thresho	● of Registra	% of Registra	Total	% of Total	Total Threshold
Chain Name	ts	Avq	Avq	Jan Avq	ld	nts	nts	Reduction	Threshol	Amount
RITE AID	4,566	6,660	7,421	6,869	12,401	1,131	24.77%	-5,108,400	-9.03%	56,546,400
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TARGET	1,665	2,264	2,652	2,396	8,513	112	6.73%	-372,800	-2.63%	14,166,400
CAREMARK	55	7,726	8,885	8,423	20,092	19	34.55%	-317,450	-28.73%	1,105,050
PUBLIX	950	1,737	1,508	1,328	5,761	91	9.58%	-270,988	-4.96%	5,467,165
AHOLD	564	5,637	6,258	5,772	10,052	49	8.69%	-169,000	-2.99%	5,659,200
AHOLD Warehouse	1	0	0	0	172,000	1	100.00%	-164,000	-95.35%	172,000
A&P	179	4,160	4,697	4,285	10,620	33	18.44%	~159,100	-8.37%	1,901,000
WEGMAN	85	8,593	9,864	9,878	15,584	21	24.71%	-130,000	-9.81%	1,324,600
GIANT EAGLE	219	7,140	8,147	7,748	11,634	46	21.00%	-110,700	-4.36%	2,536,150
THRIFTY WHITE	175	1,522	1,337	1,384	8,405	24	13.71%	-94,300	-6.41%	1,470,900
WALMART	4,281	337	363	363	7,856	5	0.12%	-86,000	-0.26%	33,632,000
SUPERVALU	186	332	500	391	8,376	5	2.69%	-70,000	-4.49%	1,558,000
OPTUMRX	2	331,704	339,300	319,724	287,000	1	50.00%	-66,000	-11.50%	574,000
KINNEY	114	8,641	9,441	7,902	13,096	26	22.81%	-65,000	-4.39%	1,479,800
WINN DIXIE	362	3,046	3,339	3,142	7,160	31	8.56%	-54,000	-2.15%	2,506,000
SHOPKO	272	4,649	5,004	4,576	9,241	16	5.88%	-52,000	-2.07%	2,513,500
HEB GROCERY	237	2,078	2,229	2,334	8,357	12	5.06%	-51,000	-2.58%	1,980,500
Topco-ROUNDYS	98	3,352	3,521	3,134	9,083	11	11.22%	-48,100	-5.40%	890,100
Topco - K-VA-T	78	5,107	5,425	5,182	10,013	9	11.54%	-41,000	-5.25%	781,000
Topco-LUNDS	15	2,379	2,840	2,127	11,000	6	40.00%	-41,000	-24.85%	165,000
Topco - HYVEE WAREHOUSE	1	0	0	0	48,000	1	100.00%	-40,000	-83.33%	48,000
Topco - KING KULLEN	11	3,927	4,155	3,664	12,545	6	54.55%	-40,000	-28.99%	138,000

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